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March 18, 2025

Via ECF and E-MAIL

Honorable Harvey J. Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106



**Re: January 22, 2025 Order Regarding Pre-trial Motions and
The Consolidated Motion to Dismiss under Fed. R. Civ. P. 12(b)(2)**

***Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al. bearing Civil Action
No. 1:24-cv-04096-HB***

Dear Judge Bartle:

We represent defendant Delvepoint, LLC ("Delvepoint") in the Daniel's Law case in the United States District Court for the District of New Jersey assigned to your Honor captioned *Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al.* bearing Civil Action No. 1:24-cv-04096-HB. We write pursuant to your January 22, 2025 Order calling for all pre-trial motions to be filed on or before March 18, 2025.

We write on behalf of Delvepoint to inform the Court that Delvepoint will join in the Defendants' Consolidated Motion to Dismiss under Fed. R. Civ. P. 12(b)(2) for lack of personal jurisdiction, which will be filed March 18 in the matter *Atlas Data Privacy, et al. v. GoHunt, LLC, et al.* bearing Civil Action No. 1:24-cv-04380-HB. Delvepoint is filing, contemporaneous with the aforementioned Motion to Dismiss under Fed R. Civ. P. 12(b)(2), a Supplemental Memorandum of Law and an Affidavit in Support.

For the reasons set forth in the Consolidated Motion to Dismiss under Fed R. Civ. P. 12(b)(2) and in Delvepoint's Supplemental Memorandum of Law, Delvepoint requests that the court grant the Motion and dismiss Plaintiff's Complaint with prejudice.

Respectfully submitted,

WADE CLARK MULCAHY LLP

/s/ Robert J. Cosgrove

Robert J. Cosgrove, Esq.

cc. Rajiv Parikh, Esq.